

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

**RILEY AMORE; and CAROLINE
PARKER,**

*individually and on behalf of all others
similarly situated,*

Plaintiffs,

v.

**AMERICAN ASSOCIATION OF
VETERINARY CLINICIANS; SOLUTION
INNOVATIONS, INC.; VCA ANIMAL
HOSPITALS, INC.; BLUEPEARL
HOLDINGS, LLC; MEDVET
ASSOCIATES, LLC; RED BANK
VETERINARY HOSPITAL, P.C.;
UNIVERSITY OF PENNSYLVANIA
SCHOOL OF VETERINARY MEDICINE;
CUMMINGS SCHOOL OF VETERINARY
MEDICINE AT TUFTS UNIVERSITY;
COLLEGE OF VETERINARY MEDICINE
AT MIDWESTERN UNIVERSITY;
NATIONAL VETERINARY ASSOCIATES,
INC.; PIEPER-OLSON VETERINARY
PARENT, LLC; PATHWAY VET
ALLIANCE, LLC; THE ANIMAL
MEDICAL CENTER, INC.,**

Defendants.

Case No. 7:25-cv-00229-EKD-CKM

DECLARATION OF SEAN C. RUSSELL

I, Sean C. Russell, declare as follows:

1. I submit this Declaration in support of Roman Lifson's Motion for *Pro Hac Vice* Admission of Sean C. Russell.

2. I am an attorney at the law firm Scott+Scott Attorneys At Law, having a telephone number of (619) 233-4564 and a fax number of (619) 233-0508.

3. I am admitted to and a member in good standing of the bar of the State of California, No. CA 308962, and am qualified and licensed to practice before the United States District Court for the Southern District of California.

4. I am applying for *pro hac vice* admission to the United States District Court for the Western District of Virginia to appear and associate with Mr. Lifson only for the conduct of the above-captioned case.

5. I will abide by all applicable and local rules of the United States District Court for the Western District of Virginia, and will promptly qualify for electronic case filing as required by Local Rule 6(d).

I hereby declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 18, 2025.

/s/ Sean C. Russell
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